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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments) MB Docket No. _____
FM Broadcast Stations) RM - _____
(Statesville and Clemmons, North Carolina))

To: Assistant Chief, Audio Division
Media Bureau

PETITION FOR RULE MAKING

Mercury Broadcasting Company, Inc. ("Mercury"), licensee of WFMX(FM), by its counsel, hereby requests that the Commission amend the FM Table of Allotments to delete Channel 289C from Statesville, North Carolina and allot Channel 289C1 at Clemmons, North Carolina as that community's first local service. If this Petition is granted, Mercury will file an application for Channel 289C1 at Clemmons, and will construct the facilities if its application is granted. No further changes are required in order to effectuate this reallocation. The following table summarizes the changes requested in this Petition:

City	Channel	
	Existing	Proposed
Statesville, North Carolina	289C	---
Clemmons, North Carolina	---	289C1

A. Technical Analysis

1. As demonstrated in the Engineering Exhibit, Channel 289C1 can be allotted to Clemmons, North Carolina at coordinates 36-17-30 North Latitude, 80-15-30 West Longitude consistent with Section 73.207 of the Commission's Rules. See Figure 1. A 70 dBu signal can be provided to Clemmons from the proposed reference point. See Figure 2. The new coverage

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MB
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area will reach 401,070 persons with a 60 dBu signal in an area of 6,999 sq. km not currently receiving the signal. See Engineering Exhibit. The loss area will remain well served, with the entire loss area retaining five or more aural services. See Engineering Exhibit.

B. Change in Community of License

2. Mercury desires to change the community of license for Station WFMX from Statesville to Clemmons under the guidelines set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 3870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("Community of License"). There, the Commission stated that a station may change its community of license without subjecting the licensee to competing expressions of interest if (1) the proposed allotment is mutually exclusive with the current allotment; (2) the current community of license will not be deprived of its only local service; and (3) the proposed arrangement of allotments is preferred under the Commission's allotment priorities. These criteria are met here. First, the proposed use of Channel 289C1 at Clemmons is mutually exclusive with the current use of Channel 289C at Statesville. See Figure 1. Second, Statesville will not be deprived of its only local service because WAME(AM), 1360 kHz, WSIC(AM), 1400 kHz, and WKKT(FM), Channel 245C, will remain licensed to Statesville. Third, the provision of a first local service at Clemmons (population 13,827) under Priority 3 will result in a preferential arrangement of allotments over the retention of a fourth local service at Statesville (pop. 23,320) under Priority 4 (all population figures taken from the 2000 U.S. Census). See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

3. Clemmons is located within the Winston-Salem Urbanized Area. In addition, the proposed 70 dBu contour will encompass more than 50% of the Greensboro and High Point

Urbanized Areas. However, the current 60 dBu signal covers more than 50% of the Charlotte and Gastonia, North Carolina Urbanized Areas. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995). Thus, the proposal can not be considered as one moving from a rural to an urban area. Nevertheless, a Tuck¹ showing is provided. In such cases, the Commission will consider the extent the station will provide service to the entire Urbanized Area, the relative populations and proximity of the suburban and central city, and, most importantly, the independence of the suburban community. In this case, from the proposed transmitter site, WFMX would place a 70 dBu contour to 100% of the Winston-Salem Urbanized Area, 67% of the Greensboro Urbanized Area, and 68.2% of the High Point Urbanized Area. Clemmons, located in Forsyth County, is 15.15 kilometers from Winston-Salem, located in Forsyth County, 35.62 kilometers from High Point, located in Guilford County, and 52.49 kilometers from Greensboro, located in Guilford County. The 2000 Census population of Clemmons (13,827) is 7.4% of the population of Winston-Salem (185,776). 16.1% of the population of High Point (85,839) and 6.1% of the population of Greensboro (223,891). These figures are similar to those of other suburban communities granted a first local preference. See, e.g., *Anniston, Alabama, et al.*, 16 FCC Rcd 3411, *aff'd by the Commission*, 16 FCC Rcd 19857 (2001) and cases cited therein. In any event, the Commission has repeatedly stated that these factors are less important than evidence of independence. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995). The following analysis of the eight Tuck Factors demonstrates the independence of Clemmons from Greensboro, High Point, and Winston-Salem and its Urbanized Areas.

¹ *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).

(1) *Extent to which the residents of Clemmons, North Carolina, work in the Village of Clemmons.* The population of Clemmons, North Carolina, was 13,827 in 2000 (2000 U.S. Census Bureau). This represents an increase of 130% from the 1990 U.S. Census figure of 6,020. According to the 2000 U.S. Census Database, 1,258 of the 6,913 workers, or 18.2%, work in their place of residence. *See Exhibit A.* *See Anniston, Alabama, supra* (16% of the residents of College Park worked in College Park); *Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876, 13880 (2001) (11.3% of working-age residents worked in community); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996) (6%). *See Exhibit A*

(2) *Newspapers and other media that cover Clemmons' needs and interests.* *The Clemmons Courier* is a weekly newspaper published each Thursday that serves Clemmons. According to Kay Henderson of the *Clemmons Courier*, the newspaper has a circulation of 13,500 and contains local news including articles on topics such as local government, local business and community news.

In addition, the Village of Clemmons maintains its own webpage at <www.clemmons.org.>. By accessing this webpage, village residents may access a wide variety of facts and events concerning Clemmons, including information regarding village officials, public and village services, public and committee meetings, development, job opportunities, public schools and community events. In addition, village residents can learn more about village government, events and programs via the local television access channel. The Village government uses the local television public access channel to relay important Village information using a rolling news screen. *See Exhibit A.*

(3) *Community leaders and residents perceive Clemmons as being separate from Greensboro, High Point and Winston-Salem.* The Village of Clemmons has its own unique identity and history that is separate from those of Greensboro, High Point, and Winston-Salem. Clemmons is located Forsyth County encompassing 12 square miles. The Village of Clemmons was founded in 1802. Last year, the Village celebrated its bicentennial. The village is named after Peter Clemmons who moved his family to the area from Delaware acquiring 216 acres of land in 1802. Clemmons was incorporated as a municipality in December 1986. See Exhibit A.

The Village publishes a link on its website specifically for new residents. There, new residents can find information about the quality of life in the Village, programs and services offered by the Village and information about park and trails, police services, road maintenance, trash and recycling, recreational activities and local events. See Exhibit A.

(4) *Clemmons has its own local government and elected officials.* According to the village webpage, the government of the Village of Clemmons functions independently of any other governmental units, and operates under a council/manager form of government. The village council has legislative authority and is responsible for making policy. The Village has a mayor and five council members. The mayor and one council member are elected to two-year terms with the remainder elected to four-year terms. Council meetings are held on the second and fourth Monday of the month. The Village Council is the governing body of the village, passing ordinances, adopting an annual budget, hiring a Village Manager and appointing volunteers to several village boards and commissions. The Village Manager is responsible for implementation of

policies and ordinances, supervision of Village employees and day-to-day operations of the Village. Among the Village's administrative offices and departments are: Town Clerk and Personnel Office, Waste Management, Finance, and Town Manager. Among the municipal services provided by the Village are: inspections, permits, zoning, site plans, garbage collection, recycling, leaf/limb pickup, hulk pickup, street lights, and street maintenance. The Village Council appoints the Clemmons Appearance Commission, Zoning Board of Adjustment, and Clemmons Planning Board. See Exhibit A. According to the village website, the 2001-2002 fiscal year budget for the Village of Clemmons was approximately \$3,000,000.

(5) *The Village of Clemmons has its own zip code and separate governmental listings in the local telephone company.* The zip code designated exclusively for the Village of Clemmons is 27012. The U.S. Postal Service operates the Clemmons Main Office at 3630 Clemmons Road. See Exhibit A. According to Clemmons Branch Librarian, residential and business listings for Clemmons are found in the Winston-Salem/Forsyth County Telephone Directory published by BellSouth, which contains a separate blue pages section for the Clemmons government listings. See Exhibit A. High Point and Greensboro have their own separate telephone directories, although BellSouth publishes a combined yellow pages directory that has listings from all these communities.

(6) *The Village of Clemmons has its own commercial establishments and health facilities.* Clemmons is home to a variety of businesses and commercial establishments. A number of these businesses identify with the community by using "Clemmons" in their name, for example: Clemmons Union 76, Clemmons Auto Service, Clemmons Accounting Service, Clemmons Carpet Co., Clemmons Country Store,

Clemmons Discount Furniture, Clemmons Exxon Tiger Mart, Optometry, Clemmons Florists and Gifts, Clemmons Food & Grocery, Clemmons Towing and Clemmons Travel. Clemmons retail businesses include: Advanced Communications Electronics, ASG Engineering, P.A., Village Candle Factory, Water Works, English's Bride and Formal Wear and Tops Travel. Banks include Central Carolina Bank & Trust Company, Piedmont Federal Savings and Loan Association and First Citizens Bank. Dining establishments include Cherries Cafe, Chester's Grille, Dine by Design and Mi Pueblo. Clemmons has numerous inns, hotels and motels such as Holiday Inn Express, Super 8 Motel and The Village Inn Golf and Conference Center. See Exhibit A.

There are several health care providers located in the Village of Clemmons. Medical services are provided by Clemmons Chiropractic, Clemmons Family Care, Clemmons Family Practice and by several sole practitioners. Clemmons Veterinary Clinic provides veterinary services. See Exhibit A.

Clemmons is also home to a number of religious organizations, such as Clemmons First Baptist Church, Clemmons United Methodist Church, Holy Family Catholic Church, Church of Christ, Hope Moravian Church, Clemmons Moravian Church, Clemmons Presbyterian Church and Immanuel Lutheran Church. See Exhibit A. Civic organizations in Clemmons include Clemmons Rotary Club, Clemmons Kiwanis Club, Clemmons Business Association, Clemmons Civic Club, Clemmons Friends of the Library and Clemmons Historical Society. Community activities and events that occur in the Village of Clemmons include: Clemmons Fall Street Clean and Tanglewood Festival of Lights. See Exhibit A.

(7) *Clemmons is a separate and distinct advertising market from Greensboro and Winston-Salem.* According to Ms. Henderson, local businesses in Clemmons advertise in *The Clemmons Courier*, which enables them to reach the residents of Clemmons, and do not rely solely on Greensboro, High Point, or Winston-Salem media sources. Residents may also access the Village's webpage to learn about community events and news. Thus, the residents of Clemmons do not need to seek out Greensboro, High Point, or Winston-Salem media sources in order to find what is happening in their community. See Exhibit A.

(8) *Clemmons has its own library and its police and fire protection are provided independent of any other jurisdiction.* Part of the Forsyth Library system, the Clemmons Branch Library serves the local population. The library is open six days a week. It has a meeting room, an extensive book and publications collection, computer and Internet access and book-on-tape and video collection. The library has a total collection of 36,459 items. The library has several programs for children and adults. See Exhibit A.

The Forsyth County Schools system provides public school education to the children of Clemmons. The school system has the following schools located in Clemmons: Clemmons Elementary School, Clemmons Middle School and West Forsyth High School. See Exhibit A.

Police protection for the Village of Clemmons is contracted out to the Forsyth County Sheriff's Department. It operates a sub-station in Clemmons. See Exhibit A. The Clemmons Area Fire Department was founded in 1951. The department is currently

composed of 48 full-time personnel. The department provides tire, rescue and emergency medical services to the village. See Exhibit A

4. Mercury reiterates that the it will apply for Channel 289C1 at Clemmons and construct the facilities if its application is granted

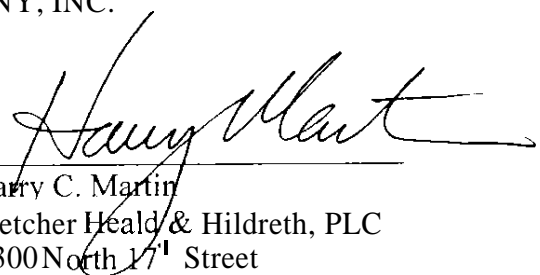
II. CONCLUSION

Grant of this petition is in the public interest because Clemmons, North Carolina will receive its first local service and 401,070 people will receive new radio service. The Commission should promptly issue a Notice of Proposed Rule Making as described herein

Respectfully submitted,

MERCURY BROADCASTING
COMPANY, INC.

By:


Harry C. Martin
Fletcher Heald & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209-3801
(703) 812-0415

Its Counsel

March 6, 2003

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 289C AT STATESVILLE, NC
ALLOT CH. 289C1 TO CLEMMONS, NC**

FEBRUARY 26, 2003

**ENGINEERING STATEMENT PREPARED ON BEHALF OF
MERCURY BROADCASTING COMPANY, INC.
LICENSEE OF WFMX (FM)
CHANNEL 289C - STATESVILLE, NORTH CAROLINA**

Facility ID: 501

ENGINEERING EXHIBIT EE-RM:

**HULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE CH. 289C A I S'IATESVILLE, NC
ALLOT CH. 289C1 TO CLEMMONS, NC**

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5. Figure 3, Distances to Urbanized Areas

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Mercury Broadcasting Company, Inc., to prepare the instant engineering exhibit in support of a rule making petition to amend the FM Table of Allotments (FCC Facility ID Number: 501).

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 26th day of February 2003

ENGINEERING EXHIBIT EE-RM:

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**DELETE: CH. 289C AT STATESVILLE, NC
ALLOT CH. 289C1 TO CLEMMONS, NC**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Mercury Broadcasting Company, Inc., licensee of Radio Station WFMX, at Statesville, North Carolina (Facility ID 501). The purpose of this statement is to provide engineering in support of a rule making petition to amend the FM Table of Allotments to delete Ch. 289C at Statesville and re-allot Ch. 289C1 to Clemmons, NC, and to modify the license of WFMX accordingly.

The city of Statesville (Iredell County) will continue to be served by three commercial aural services (2 **AMs** & 1 FM) and grant of this proposal will result in the **first aural service** to Clemmons, NC (Forsyth County).

WFMX wishes to point out that the downgrade it seeks is on its existing channel with a proposed location which is less than the separation specified by Section 73.207 and, therefore, it is not necessary to demonstrate the availability of an additional equivalent channel in accordance with Section 1.420(g) of the rules.

The proposal reference point is not within 290 kilometers (180 miles) of a United States Border and, therefore, foreign concurrence is not required.

Proposed Reference Site

For the purposes of this rule making WFMX proposes to use a **special** reference point for the allotment at Clemmons, NC.

N. Latitude:	36"	17'	30"	NAD-27
W. Longitude.	80"	15'	30"	

The proposed reference site will provide an unobstructed view of the city of license, Clemmons, NC and is located close enough (approximately 32 kilometers away) to serve the entire community with the required 3.16 mV/M or 70 dBu contour (reference radius of 50 km). **Figure 2** is a 70 & 60 dBu coverage map showing the existing contours using terrain & the proposed contours using reference circles. The coordinates for the city of Clemmons are 36-01-17 / 80-22-56. Because of land use / zoning restrictions, FAA restrictions and locations of existing towers, WFMX requests that the re-allotment only be **granted at** coordinates of its choosing.

Channel Allocation Study

Figure 1 is a Channel Allocation Study from the special reference point proposed for Ch. 289C1 at Clemmons, North Carolina. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations.

It should be noted that the **licensed operation** of WFMX on Ch. 289C at Statesville, NC, is **short spaced** to two other stations. The first short spacing of 23 **km** with WFJA on 288A at Sanford, NC, is a pre-1964 grandfathered short spacing governed by Section 73.213(a). The second short spacing of 3 km with WZNY on 289C at Augusta, **GA**, was requested by WZNY per Section 73.215. **This** proposal to re-allot the channel to Clemmons **will eliminate both of these existing short spacings**

The licensed site of WFMX is located **64.9 km** (40.3 miles) away whereas the required co-channel separation (**C to C1**) is 270 km (167.8 miles). Therefore, the proposed substitution is in accordance with Section **1.420(g)** and is not required to demonstrate the availability of an additional equivalent channel.

Public Interest Showing

The proposed change in community & downgrade to Class C1 facilities will permit WFMX to provide a much needed **first service**. WFMX presently provides a 60 dBu service to 2,733,625 persons and 22,316 sq.km. Assuming maximum facilities from the special reference point, the C1 facility will provide 60 dBu (72 km reference circle) service to 1,433,845 persons and 16,286 sq.km. This represents a **47.5%** loss in population and a 27.0% loss in area. The C1 facility will provide new service (in gain **area**) to 401,070 persons and 6,999 sq.km. **All** population figures are based upon 2000 Census.

A review of the loss area indicates that it contains the urbanized area of Charlotte & Gastonia, NC. Those two main counties (Mecklenburg & Gaston) encompass 885,819 persons.

The entire loss area was evaluated to determine the number of **other aural services** which would remain upon deletion of Ch. 289C from Statesville. This analysis indicates that the minimum number of **AM & FM** stations serving the area is **at least five** with the vast majority of the loss area receiving **8 to 14 FM** stations (not counting **AMs**). Similarly, it was determined that the gain area is also well served.

The city of Clemmons is located in Forsyth County and has a population of 13,827 persons. The allotment of Channel 289C1 will be the **first aural service** licensed to this community. The city of Statesville will continue to have two licensed AMs (550 & 1400 kHz) and one licensed FM (245C) facilities (for a **total of three** commercial services) upon grant of this RM petition

From **Figure 2** it can be determined that the both the existing and proposed facilities provide 70 dBu city grade service to 100% of the Winston-Salem urbanized area. In addition, it has been determined that the proposed facilities will also provide 70 dBu service to 68.2% of the High Point and to 67.0% of the Greensboro urbanized areas. **Figure 3** is a tabulation which provides the distances to these areas from both the special RM reference point and from the reference point for the city of Clemmons, NC. Based upon this it is necessary for the rule making petition to discuss a "**Tuck Analysis**". As concluded in the legal section of the petition, WFMX has established that a town of 13,827 persons is indeed independent of the larger towns in the area

Based upon the above information, WFMX believes that its request results in a **prcfercntial arrangement** of allotments and therefore, serves the public interest.

SUMMARY

Mercury Broadcasting Company, Inc., licensee of Radio Station WFMX, at Statesville, North Carolina (Facility ID 501) requests that the FM Table of Allotments be amended to delete Ch. 289C at Statesville and re-allot Ch. 28961 to Clemmons, NC and to modify the license of WFMX accordingly.

	Present	Proposed
Statesville, NC	245C, 289C	245C
Clemmons, NC	- - -	289C1

WFMX believes that the proposed change in community and establishment of a new first service facility will **serve the public interest**. If granted, WFMX will quickly file an application for construction permit.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

February 26, 2003.

MERCURY BROADCASTING
RADIO STATION WFMX (FM)

REFERENCE

36 17 30 N
80 15 30 W

CLASS = C1

Current Spacings

----- Channel 289 ~ 105.7 MHz -----

DISPLAY DATES

DATA 02-22-03

SEARCH 02-24-03

Call	Channel	Location	Dist	Azi	FCC	Margin
WFMX	LIC 289C	Statesville	NC 64.90	218.2	270.0	Self
WFJA	LIC 288A	Sanford	NC 133.36	134.9	133.0	0.36
WKDEFM	LIC 288A	Altavista	VA 133.50	43.3	133.0	0.50
WTNJ	LIC 290B	Mount Hope	WV 195.60	335.2	195.0	0.60
WDCG	LIC 286C	Durham	NC 109.49	114.9	105.0	4.49
WBRW	LIC-Z 287C3	Blacksburg	VA 101.30	348.8	76.0	25.30
WBRW .A	APP 287C3	Blacksburg	VA 101.30	348.8	76.0	25.30
ALLO	VAC 286C1	Durham	NC 109.49	114.9	82.0	27.49
WLNI	LIC 290A	Lynchburg	VA 161.58	38.3	133.0	28.58
ALLO	RSV 291C3	Jefferson	NC 105.54	281.8	76.0	29.54
WGTHFM	LIC 288A	Richlands	VA 165.59	305.9	133.0	32.59
WMNAFM	LIC 292A	Gretna	VA 108.78	49.3	75.0	33.78
WGQR	LIC 289A	Elizabethtown	NC 236.93	140.9	200.0	36.93

CHANNEL STUDY - 289C1 - SPECIAL REFERENCE

RADIO STATION WFMX (FM)

RULE MAKING

ADD 289C1 - CLEMMONS, NORTH CAROLINA

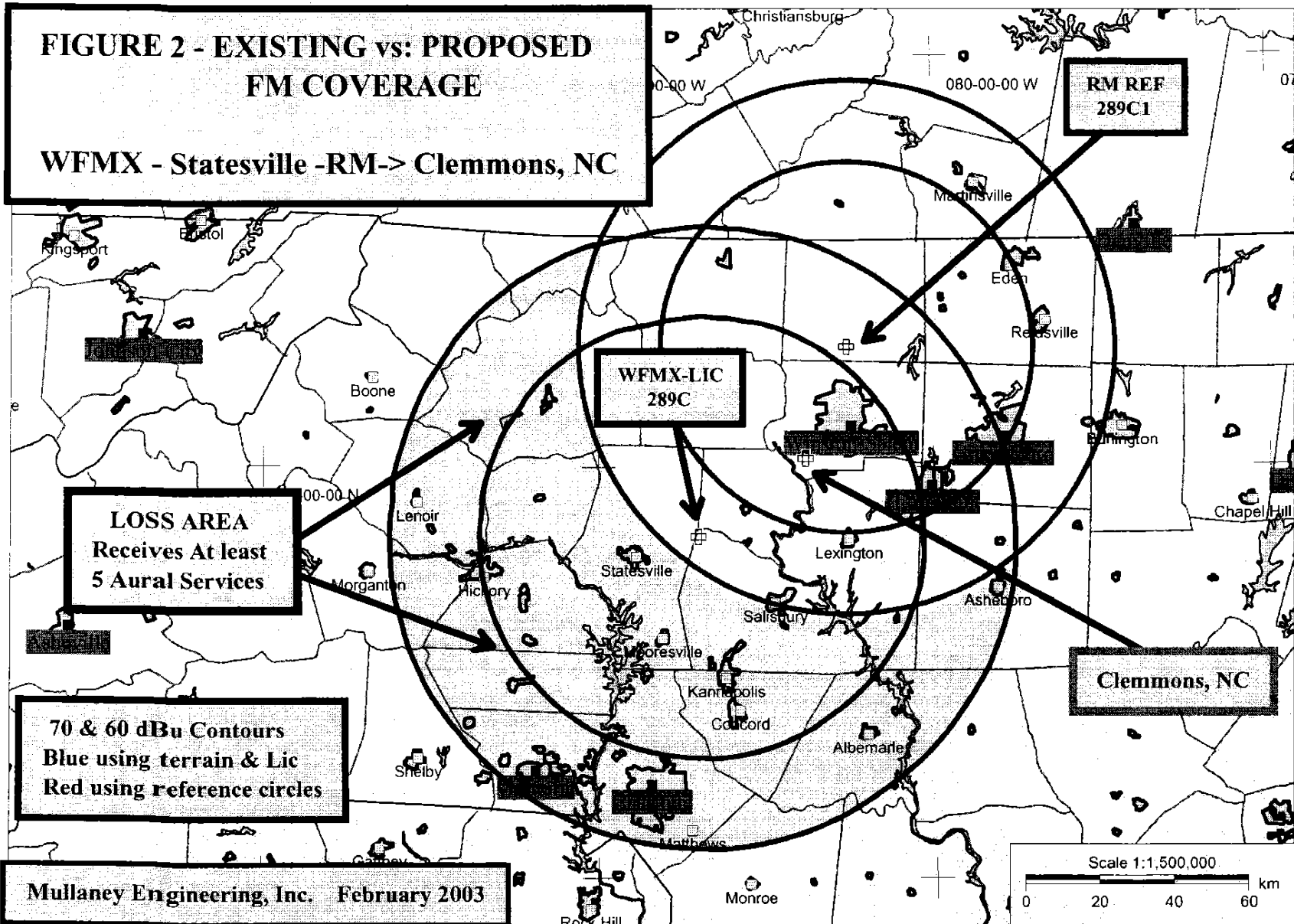
MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

FIGURE 1

FEBRUARY 2003

**FIGURE 2 - EXISTING vs: PROPOSED
FM COVERAGE**

WFMX - Statesville -RM-> Clemmons, NC



From Proposed Special Reference Point for Clemmons, NC

REFERENCE LAT : 36-17-30.0
LON : 80-15-30.0

	NAME / LOCATION	LATITUDE LONGITUDE	BEARING FROM REF. TO REF.	DISTANCE MI./KM.
	*****	*****	*****	*****
1	RM Special Reference	36-17-30.0 80-15-30.0	0.00 0.00	0.00 0.00
2	Clemmons, NC	36-01-17.0 80-22-56.0	200.35 20.27	19.88 31.99
3	Greensboro, NC (UA)	36-02-00.0 79-48-00.0	124.78 305.06	31.21 50.22
4	High Point, NC (UA)	35-54-00.0 80-01-00.0	153.43 333.57	30.20 48.60
5	Winston-Salem, NC (UA)	36-05-59.0 80-14-40.0	176.65 356.66	13.26 21.33

From City Reference Point for Clemmons, NC

REFERENCE LAT : 36-01-17.0
LON : 80-22-56.0

	NAME / LOCATION	LATITUDE LONGITUDE	BEARING FROM REF. TO REF.	DISTANCE MI./KM.
	*****	*****	*****	*****
1	RM Special Reference	36-17-30.0 80-15-30.0	20.27 200.35	19.88 31.99
2	Clemmons, NC	36-01-17.0 80-22-56.0	0.00 0.00	0.00 0.00
3	Greensboro, NC (UA)	36-02-00.0 79-48-00.0	88.38 268.72	32.62 52.49
4	High Point, NC (UA)	35-54-00.0 80-01-00.0	112.20 292.41	22.13 35.62
5	Winston-Salem, NC (UA)	36-05-59.0 80-14-40.0	54.84 234.92	9.416 15.153

DISTANCES TO URBANIZED AREAS

RADIO STATION **WFMX (FM)**
RULE MAKING
ADD 289C1 - CLEMMONS, NORTH CAROLINA

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FIGURE 3
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